



GE  
159 Plastics Avenue  
Pittsfield, MA 01201  
USA

*Transmitted Via Overnight Courier*

June 13, 2006

Mr. William P. Lovely, Jr.  
U.S. Environmental Protection Agency  
EPA New England  
One Congress Street, Suite 1100 (MC HBO)  
Boston, Massachusetts 02114-2023

**Re: GE-Pittsfield/Housatonic River Site  
Former Oxbow Areas A and C (GECD410)  
Revision to Second Addendum to Final Removal Design/Removal Action Work Plan**

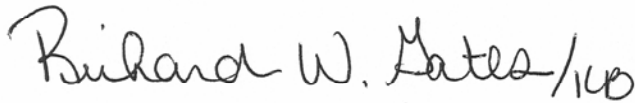
Dear Mr. Lovely:

On April 14, 2006, the General Electric Company (GE) submitted to the U.S. Environmental Protection Agency (EPA) a *Second Addendum to Final Removal Design/Removal Action Work Plan for Former Oxbow Areas A and C* (Second Work Plan Addendum), which proposed revised soil removal limits at certain of the properties within the Former Oxbow Areas A and C Removal Action Area (RAA). As described in that document, GE proposed soil removal/replacement actions at Parcels I8-23-4, I8-23-5, and I8-23-9 so as to achieve the Performance Standards for residential properties. (Since Parcels I8-23-4 and I8-23-5 are included in this RAA solely for the purpose of addressing PCBs, the proposed actions were shown to achieve the residential Performance Standards for PCBs.) In a letter dated May 31, 2006, EPA provided conditional approval of the Second Work Plan Addendum. In that letter, EPA directed GE to consider expanding, subject to constructability considerations, the soil removal limits shown on Technical Drawing 3 of the Second Work Plan Addendum to include the paved areas on Parcel I8-23-9 associated with eight soil sample locations (RAA11-T2, SB-415, SB-416, SB-417, SB-418, SB-419, SB-420, and SB-421) and the paved area on Parcel I8-23-9 associated with sample location RAA11-T10.5. That letter further directed GE to submit a revised Technical Drawing 3 that addresses the above condition within 14 days.

As demonstrated in the Second Work Plan Addendum, the remediation proposed therein would achieve the applicable residential Performance Standard for PCBs at Parcel I8-23-5 and those for PCBs and other constituents at Parcel I8-23-9. However, in response to EPA's May 31, 2006 letter, GE has elected to expand the proposed soil removal limits to include the top foot of soil beneath the pavement in the following areas (to the extent feasible based on the existence of on-site structures and equipment): (1) the paved areas on Parcel I8-23-5 that are associated with the soil samples within the top foot at locations RAA11-T2 and SB-415 through SB-421, as well as locations SB-308 and RAA11-X4; and (2) the paved area on Parcel I8-23-9 associated with the 0- to 1-foot soil sample at location RAA11-T10.5. This will involve the removal of an additional approximately 115 cubic yards (cy) of soil from the 0- to 1-foot depth increment – approximately 100 cy at Parcel I8-23-5 and approximately 15 cy at Parcel I8-23-9. A revised Technical Drawing 3 (Excavation Limits) showing the revised soil removal limits is attached to this letter.

Please call me if you have any questions or comments regarding this revision.

Sincerely,



Richard W. Gates  
Remediation Project Manager

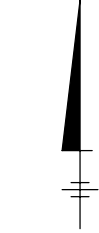
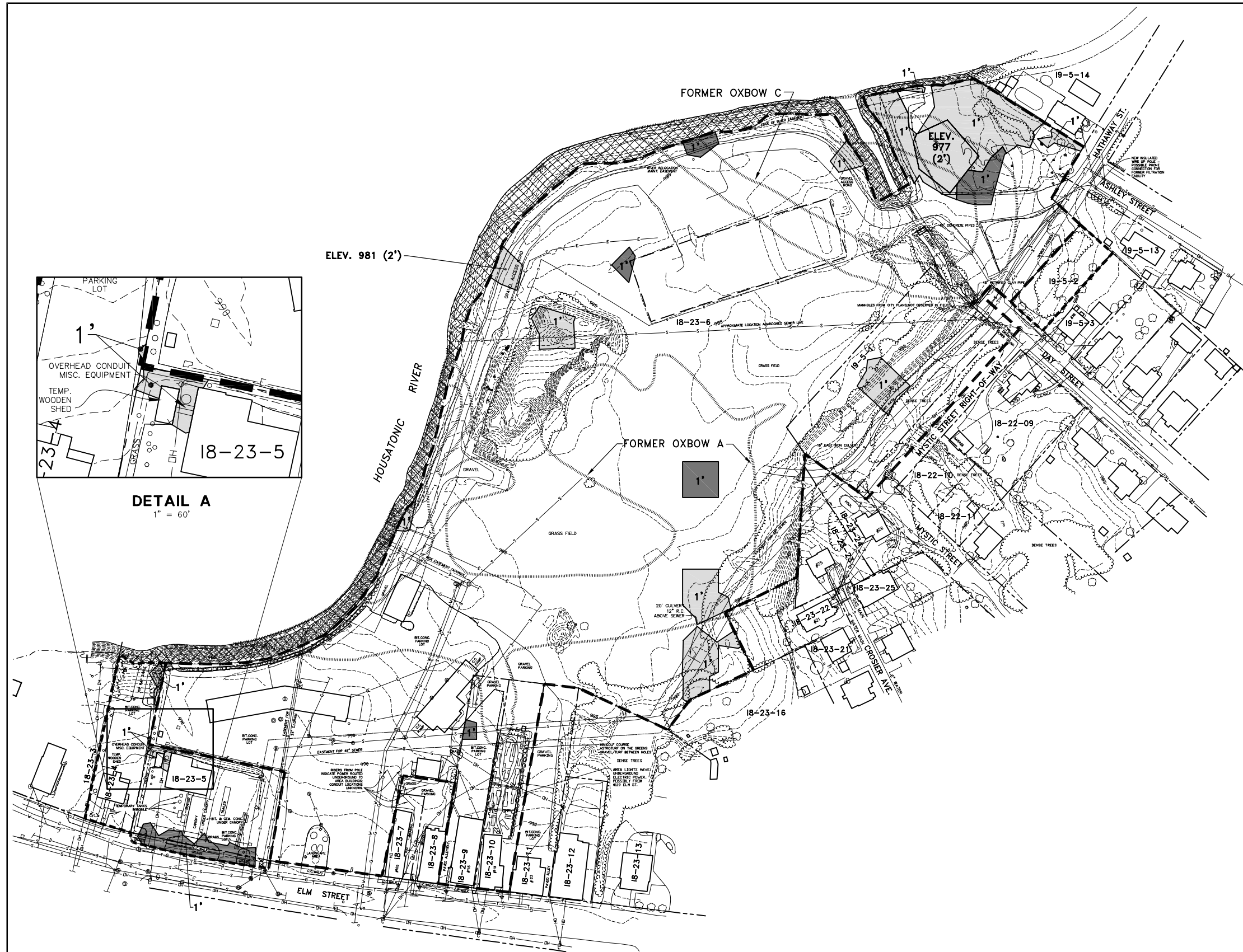
Attachment

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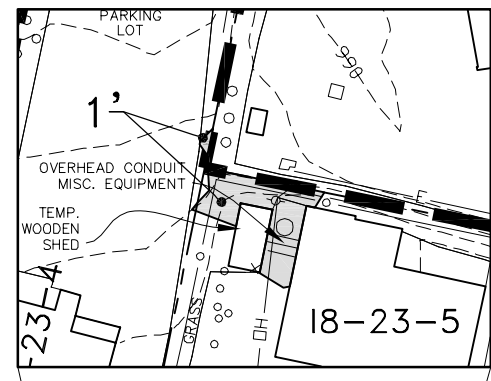
cc: Dean Tagliaferro, EPA  
Tim Conway, EPA  
John Kilborn, EPA  
Holly Inglis, EPA  
Rose Howell, EPA\*  
Linda Palmieri, Weston  
K.C. Mitkevicius, USACE  
Susan Steenstrup, MDEP (2 copies)  
Anna Symington, MDEP\*  
Jane Rothchild, MDEP\*  
Thomas Angus, MDEP\*  
Nancy E. Harper, MA AG\*  
Dale Young, MA EOE\*  
Mayor James Ruberto, City of Pittsfield\*

Michael Carroll, GE\*  
Andrew Silber, GE  
Rod McLaren, GE\*  
James Nuss, BBL  
James Bieke, Goodwin Procter LLP  
Property Owner - Parcel I8-23-4  
Property Owner - Parcel I8-23-9  
David J. Baker, ExxonMobil  
George W. Crimmins, III, Esq., McCusker,  
Anselmi, Rosen, Carvelli, and Walsh  
Public Information Repositories  
GE Internal Repository

\* without attachment



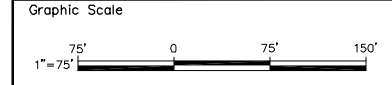
- LEGEND:**
- APPROXIMATE ORIGINAL REMOVAL ACTION AREA BOUNDARY
  - - - - MODIFIED REMOVAL ACTION AREA BOUNDARY (PROPERTIES 18-23-4 AND 18-23-5 ADDED TO THE RAA FOR THE PURPOSE OF ADDRESSING PCBs ONLY)
  - FORMER FILTRATION FACILITY
  - - - - PROPERTY BOUNDARY
  - 18-23-6 PROPERTY ID
  - EDGE OF WATER
  - VEGETATION
  - APPROXIMATE FORMER OXBOW/LOW LYING AREA
  - ▨ AREA INCLUDED AS PART OF 1 1/2-MILE REACH REMOVAL ACTION
  - ◇ LIGHT POLE
  - UTILITY POLE
  - CATCH BASIN
  - ⊙ DRAIN MANHOLE
  - ⊙ SANITARY MANHOLE
  - ⊙ TELEPHONE MANHOLE
  - ⊙ WATER SHUTOFF
  - INDEX ELEVATION CONTOUR
  - INTERMEDIATE ELEVATION CONTOUR
  - WOODEN FENCE
  - WIRE FENCE
  - CHAIN LINK FENCE
  - GUARDRAIL
  - GAS SERVICE
  - WATER SERVICE
  - SANITARY SEWER
  - ELECTRIC SERVICE
  - STORM DRAIN LINE
  - TELEPHONE SERVICE
  - OVERHEAD WIRES
  - ▨ TSCA REMOVAL (SEE NOTE 3)
  - ▨ NON-TSCA REMOVAL (SEE NOTE 3)



**DETAIL A**  
1" = 60'

- NOTES:**
1. REFER TO DRAWING 1 FOR ADDITIONAL BASEMAP INFORMATION AND CONTRACTOR REQUIREMENTS.
  2. AREAS DESIGNATED AS '1' WILL BE SUBJECT TO SOIL REMOVAL ACTIVITIES TO A DEPTH OF 1 FOOT BELOW GROUND SURFACE. ALL OTHER EXCAVATIONS SHALL EXTEND TO THE SPECIFIED ELEVATION. (DEPTHS SHOWN IN PARENTHESES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY).
  3. EXCAVATED MATERIALS SPECIFIED HEREIN AS TSCA TO BE DISPOSED OF AT THE BUILDING 71 OPCA. ALL OTHER EXCAVATION MATERIALS SPECIFIED HEREIN TO BE DISPOSED OF AT THE HILL 78 OPCA.
  4. TREES AND RIPRAP WITHIN THE LIMITS OF EPA'S HOUSATONIC RIVER EXCAVATION SHALL BE PROTECTED OR RESTORED TO EXISTING CONDITION.
  5. CONTRACTOR SHALL TAKE PRECAUTIONARY MEASURES IN THE VICINITY OF UTILITY POLES THROUGHOUT THE IMPLEMENTATION OF REMOVAL ACTIONS.
  6. THE CONTRACTOR SHALL SHEAR/SHRED ALL TREES AND SHRUBS (INCLUDING ROOTS) REMOVED DURING THE PERFORMANCE OF RESPONSE ACTIONS FOR TRANSPORTATION TO THE BUILDING 71 OPCA OR HILL 78 OPCA AS APPROPRIATE AND APPROVED BY GE.

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L: ON=\*, OFF=REF  
P: PAGESET/PLT-CDL2B  
6/13/06 SYR-85-DMW TJR DMW  
N/20633010/CONTRACT/20633007.DWG



THIS DRAWING WAS PREPARED AT THE SCALE INDICATED IN THE TITLE BLOCK. INACCURACIES IN THE STATED SCALE MAY BE INTRODUCED WHEN DRAWINGS ARE REPRODUCED. USE THE GRAPHIC SCALE BAR IN THE TITLE BLOCK TO DETERMINE THE ACTUAL SCALE OF THIS DRAWING.

No.	Date	Revisions	Init

Professional Engineer's Name  
Professional Engineer's No.  
State  
Date Signed  
Project Mgr. KLB  
Designed by  
Drawn by DMW

**BBL**  
BLASLAND, BOUCK & LEE, INC.  
engineers, scientists, geotechnicians

GENERAL ELECTRIC COMPANY • PITTSFIELD, MASSACHUSETTS  
SECOND ADDENDUM TO FINAL RD/RA WORK PLAN FOR FORMER OXBOW AREAS A AND C

## EXCAVATION LIMITS

TECHNICAL DRAWINGS

BBL Project No. 206.33  
Date APRIL 2006  
Blasland, Bouck & Lee, Inc.  
Corporate Headquarters  
6723 Towpath Road  
Syracuse, NY 13214  
315-446-9120